



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**FILED**

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Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.

Rulemaking 15-02-020  
Filed February 26, 2015

2016 RENEWABLE PORTFOLIO STANDARD PROCUREMENT PLAN

TENASKA CALIFORNIA ENERGY MARKETING, LLC

August 15, 2016

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**I. INTRODUCTION**

In accordance with the California Public Utilities Commission's ("Commission") May 17, 2016 *Assigned Commissioner and Assigned Administrative Law Judge's Ruling Identifying Issues and Schedule of Review for 2016 Renewables Portfolio Standard Procurement Plans* ("ACR"), and the June 8, 2016 *Email Ruling Granting, In Part, IOUs Request for an Extension of Time to Produce the 2016 RPS Procurement Plans*, Tenaska California Energy Marketing, LLC ("TCAL") hereby submits this 2016 Renewables Portfolio Standard Procurement Plan ("RPS Procurement Plan"). As directed by the ACR, this RPS Procurement Plan includes responses for the issues expressed in ACR sections 6.1 through 6.6, 6.13, and 6.15 with Appendix A as required for all retail sellers.

**II. RPS PROCUREMENT PLAN**

**6.1 Assessment of RPS Portfolio Supplies and Demand - § 399.13(a)(5)(A)**

TCAL does not currently serve load in California and does not anticipate developing load obligations in the foreseeable future. Therefore TCAL's current assessment of its RPS Portfolio demand and supply requirements is that TCAL will have no demand, and no supply. If in the future TCAL develops load obligations, TCAL anticipates that future plans will include contracting bilaterally with multiple counter parties to meet Renewable Portfolio Standard ("RPS") requirements.

## **6.2 Project Development Status Update - § 399.13(a)(5)(D)**

TCAL does not own or develop generation resources, and has no contracts as yet with renewable generation resources for supply of renewable energy.

## **6.3. Potential Compliance Delays - § 399.13(a)(5)(B)**

TCAL does not currently serve load in California and therefore does not currently have an RPS compliance requirement.

## **6.4. Risk Assessment - § 399.13(a)(5)(F)**

TCAL does not own or develop generation resources, and has no contracts in place for renewable energy supply from any renewable energy resources, and therefore is not experiencing any risks associated with delayed construction, financing, permitting, etc. It is anticipated that future plans will include acquiring renewable energy supply from an affiliated solar generation facility under a purchase contract to meet RPS requirements. At such time, risks will be evaluated and incorporated into TCAL's RPS Procurement Plan.

## **6.5. Quantitative Information - §§ 399.13(a)(5)(A), (B), (D) and (F)**

TCAL has provided a quantitative assessment to support the qualitative descriptions provided in this RPS Procurement Plan, which is attached as Appendix A.

## **6.6. "Minimum Margin" of Procurement - § 399.13(a)(4)(D)**

TCAL currently does not serve load in California and therefore has no current minimum margin of over procurement.

## **6.13. Important Changes to Plans Noted**

TCAL has not served load since it was certified as an ESP in California. There have been no changes to the RPS Procurement Plan over the past year.

## **6.15. Safety Considerations**

TCAL does not employ field personnel. Our safety considerations reflect standard office workforce safety and wellness issues. As a subsidiary of Tenaska Energy Inc. (Tenaska) and as it

applies to our business, TCAL is governed by the Tenaska Environmental Health and Safety Policy. Tenaska is committed to operate its business in a manner protective of human health, the environment, and property, while complying with all applicable laws and regulations. Tenaska employees are committed to working as a team with contractors to achieve compliant and incident free construction and operations while striving to effectively implement the safety related policies in our planning, daily work, and business decisions.

Dated: August 15, 2016

Respectfully submitted,



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James Lunday, CPA, CGMA  
Tenaska California Energy Marketing, LLC

## VERIFICATION

I, Barton D. Ford, am an officer of Tenaska California Energy Marketing, LLC and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by Energy Division.

Executed on August 15, 2016, in Arlington, TX.

A handwritten signature in black ink, appearing to read 'B. D. Ford', is written over a solid horizontal line.

Barton D. Ford  
Vice President  
Tenaska California Energy Marketing, LLC  
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bford@tnsk.com

## APPENDIX A

Variable	Calculation	Item	Deficit from RPS prior to Reporting Year	2011 Actuals	2012 Actuals	2013 Actuals	2011-2013	2014 Actuals	2015 Actuals	2016 Forecast	2014-2016	2017 Forecast	2018 Forecast	2019 Forecast	2020 Forecast	2017-2020	
	Forecast Year		0	-	-	-	CP1	-	-	1	CP2	2	3	4	5	CP3	
<b>Annual RPS Requirement</b>																	
A		Bundled Retail Sales Forecast (LTPP)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B		RPS Procurement Quantity Requirement (%)	0			20.0%	20.0%	21.7%	23.3%	25.0%	23.3%	27.0%	29.0%	31.0%	33.0%	33.0%	
C	A*B	Gross RPS Procurement Quantity Requirement (GWh)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
D		Voluntary Margin of Over-procurement	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E	C+D	Net RPS Procurement Need (GWh)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>RPS-Eligible Procurement</b>																	
Fa		Risk-Adjusted RECs from Online Generation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Faa		Forecast Failure Rate for Online Generation (%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fb		Risk-Adjusted RECs from RPS Facilities in Development	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fbb		Forecast Failure Rate for RPS Facilities in Development (%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fc		Pre-Approved Generic RECs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fd		RECs Pending CPUC Approval	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fe		Executed REC Sales	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
F	a + Fb + Fc + Fd + Fe	Total RPS Eligible Procurement (GWh)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
F0		Category 0 RECs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
F1		Category 1 RECs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
F2		Category 2 RECs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
F3		Category 3 RECs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Gross RPS Position (Physical Net Short)</b>																	
Ga	F-E	Annual Gross RPS Position (GWh)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gb	F/A	Annual Gross RPS Position (%)	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
<b>Application of Bank</b>																	
Ha		Existing Banked RECs above the PQR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hb		RECs above the PQR added to Bank	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hc		Non-bankable RECs above the PQR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
H	Ha+Hb	Gross Balance of RECs above the PQR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ia		Planned Application of RECs above the PQR towards RPS Compliance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ib		Planned Sales of RECs above the PQR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
J	H-Ia-Ib	Net Balance of RECs above the PQR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
J0		Category 0 RECs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
J1		Category 1 RECs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
J2		Category 2 RECs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Expiring Contracts</b>																	
K		RECs from Expiring RPS Contracts	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Net RPS Position (Optimized Net Short)</b>																	
La	(Ca+H+Ia)-E	Annual Net RPS Position after Bank Optimization (GWh)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lb	(Ca+H+Ia)/A	Annual Net RPS Position after Bank Optimization (%)	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

Note: Fields in grey are protected as Confidential under CPUC Confidentiality Rules

Note: Values are shown in GWhs



Facility Name	Technology	Contract Expiration Date	MW	Expected Annual Generation (GWh)	Location	PCC Classification
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N/A